

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

THE JOY CENTER, LLC,	:
Plaintiff	:
	:
v.	: No.: 2011-CV-2492
	:
BKS INVESTMENT, LLC and	:
WILLIAM HYNES,	:
Defendants	:

**NOTICE OF REMOVAL OF CASE TO FEDERAL COURT
PURSUANT TO 28 USC § 1441, FRBP 9011 and 9027**

Debtor files counterpart originals of the following notice with the Clerk of the Bankruptcy Court and the Clerk of Court from which the case is removed.

1. Movant is debtor, William Hynes whose address for service of process is 337 Clearview Avenue, Nazareth, PA 18064.
2. Respondent is The Joy Center, LLC, whose registered office address is 972 N. Fairville Avenue, Harrisburg, Pennsylvania 17112.
3. The matter to be removed will become an adversary proceeding in the bankruptcy court.
4. This matter involves a core proceeding pursuant to 28 U.S.C. 157(a) and (b)(2)(E).
5. The present chapter 13 proceeding was filed on January 4, 2012, and an automatic stay took effect at that time pursuant to 11 USC §362(a).
6. In the pending state court action which is the subject of this removal, Plaintiff, The Joy Center, LLC, filed a praecipe for writ of summons and Pre-Complaint

Discovery. Despite Plaintiff's allegations to the contrary, Defendant has complied with all discovery requests.

WHEREFORE, Debtor affords this notice of removal.

Respectfully submitted,

KEIFER & TSAROUHIS, LLP

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